

# BakerHostetler

## Baker&Hostetler LLP

45 Rockefeller Plaza  
New York, NY 10111

T 212.589.4200  
F 212.589.4201  
www.bakerlaw.com

Jason I. Blanchard  
direct dial: 212.589.4619  
jblanchard@bakerlaw.com

May 7, 2018

### VIA ECF AND E-MAIL

Honorable Stuart M. Bernstein  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, Room 723  
New York, New York 10004-1408

Re: *Securities Investor Protection Corporation v. Bernard L. Madoff Investment Securities,*  
*Adv. Pro. No. 08-01789 (SMB)*

Dear Judge Bernstein:

We are counsel to Irving H. Picard, trustee (the "Trustee") for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") and the chapter 7 estate of Bernard L. Madoff under the Securities Investor Protection Act, 15 U.S.C. § 78aaa et seq. ("SIPA"). We write to respectfully request the Court's leave to file a supplemental declaration in further support of the *Trustee's Response to the Motion Filed By Dean Loren* (ECF No. 17276).

On April 25, 2018, the Court conducted a hearing on Mr. Loren's motion (ECF No. 17160). Based on certain statements Mr. Loren made at the hearing and in his subsequent supplemental filing (ECF No. 17525), the Trustee would like to supplement the record with additional information regarding the Trustee's notice of the Claims Procedure Order (ECF No. 12) and the Trustee's review of BLMIS's books and records pertaining to Wolf Popper LLP.

The Trustee has consulted with Mr. Loren's counsel, who has no objection to the Trustee's request.

Grant  
SMB  
5/6/18

Respectfully submitted,

*/s/ Jason I. Blanchard*

Jason I. Blanchard  
Associate

cc: Lalit K. Jain (via email)